

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,
LAURENCE S. GILLICK, ROBERT S.
ROTH, JONATHAN P. YAMRON, and
MANFRED G. GRABHERR

Defendants.

Civil Action No. 04-10353 PBS

**ORAL ARGUMENT
REQUESTED**

**PLAINTIFF’S EMERGENCY MOTION TO MODIFY ORDER DENYING
IMPOUNDMENT (IN PART)**

Plaintiff ScanSoft, Inc. (“ScanSoft”) moves to modify the Court’s Order denying VST’s Motion for Impoundment of its Memorandum In Support of Objections to The Magistrate Judge’s Order Regarding Trade Secrets. In denying in part VST’s Motion for Impoundment, the Court allowed Attachment C to the Declaration of Wendy S. Plotkin to remain sealed. Attachment C to the Declaration contains HIGHLY CONFIDENTIAL MATERIAL belonging to ScanSoft. ScanSoft appreciates the Court’s decision to impound Attachment C, but respectfully points out that the runover paragraph on pages 4 and 5 of VST’s Memorandum quotes verbatim from the HIGHLY CONFIDENTIAL MATERIAL (in Attachment C) that the Court has protected from disclosure, and also includes paraphrases of the contents of such material. As such, ScanSoft respectfully requests that the Court (i) modify its Order and redact verbatim quotations and paraphrases from the impounded material found on pages 4 and 5 of VST’s Memorandum; and

(ii) order VST to treat the HIGHLY CONFIDENTIAL MATERIAL in accordance with the parties' Protective Order in this case.

CONCLUSION

For the reasons stated above, ScanSoft respectfully requests that those portions of VST's Memorandum In Support of Its Objections To The Magistrate Judge's Order Regarding Trade Secrets that contain verbatim quotations from Attachment C to the Declaration of Wendy S. Plotkin be redacted from the public record and that VST treat the material in accordance with the parties' Protective Order in this case.

CERTIFICATE PURSUANT TO CIVIL LOCAL RULE 7.1

I hereby certify that counsel for the parties conferred on this Motion on April 29, 2005 and were unable to reach agreement.

Dated: April 29, 2005

SCANSOFT, INC.,

By its attorneys,

/s/ Lisa M. Fleming
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